

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 4:19 MJ 7501 SPM
	)	
MAURICE MADISON	)	
	)	
Defendant.	)	

**MOTION FOR PRETRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its Attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Lisa M. Yemm, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the Government states as follows:

1. Defendant is charged with two counts: Possession of a Firearm in Furtherance of a Drug Trafficking Crime in violation of Title 18, United States Code, Section 924(c) and Possession with the Intent to Distribute Fentanyl in violation of Title 21, United States Code, Section 841(a).

2. Accordingly, a rebuttable presumption arises pursuant to Title 18, United States Code, Section 3142(e)(3) that there are no conditions or combination of conditions which will reasonably assure the appearance of the defendant as required, and the safety of any other person and the community.

3. Defendant faces a mandatory minimum of five years imprisonment if convicted on Count I, with a maximum possible sentence of life in prison, consecutive to any other

sentence he may receive, including any sentence for Count II, which carries a maximum of sentence of 20 years upon conviction.

4. Defendant was arrested on December 11, 2019, in possession of a Glock 29 10mm semi-automatic handgun, two pills of methamphetamine and oxycodone, thirty-four capsules containing Fentanyl, approximately one-thousand (\$1000.00) in United States Currency and three (3) cellular telephones.

5. Defendant was released, but was arrested again three days later occupying a stolen vehicle. Police located a Ruger LCP 9mm semi-automatic pistol in the glove compartment of that vehicle.

6. Defendant is an armed drug dealer and therefore a threat to the community.

7. There is also a serious risk that the defendant will flee, particularly in light of the nature of the penalties the defendant is facing.

WHEREFORE, the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN  
United States Attorney

/s/Lisa M. Yemm  
LISA M. YEMM#64601MO  
Assistant United States Attorney